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Attorneys for Defendant
PATREON, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIA
MACK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-CV-03131-JCS

**SUPPLEMENTAL DECLARATION OF
NATHAN WALKER IN SUPPORT OF
DEFENDANT PATREON, INC.'S OBJECTIONS
TO PUTATIVE OPT-OUTS SUBMITTED BY
LEXCLAIM RECOVERY GROUP US, LLC**

1 I, Nathan L. Walker, declare as follows:

2 1. I am a partner at The Norton Law Firm PC and counsel of record for Patreon, Inc. I have
3 personal knowledge of the facts set forth herein, and, if called upon to testify, could and would testify
4 competently thereto.

5 2. On December 9, 2024, I received an email with two attachments from Jason Harrow.
6 Attached as **Exhibit M** is a true and correct copy of that email and the attachments.

7 3. On February 19, 2025, the Court held a hearing on the fairness of the class action
8 settlement in this case. I attended the hearing. On information and belief, on February 20, my law firm
9 obtained a copy of the official transcript of the fairness hearing from the Court reporter for the hearing.
10 Attached as **Exhibit N** is a true and correct copy of the following pages of the transcript, with yellow
11 highlighting I have added on some of the text: 1-3, 23-26, and 48.

12 4. Attached as **Exhibit O** is a true and correct copy of the Introductory Note for Chapter 15 of
13 the Restatement (Second) of Contracts (1981). I downloaded this document from Westlaw.com on
14 February 26, 2025.

15 5. Attached as **Exhibit P** is a true and correct copy of Section 317 of the Restatement (Second)
16 of Contracts (1981). I downloaded this document from Westlaw.com on February 26, 2025.

17 6. Attached as **Exhibit Q** is a true and correct copy of Section 652I of the Restatement
18 (Second) of Torts (1977). I downloaded this document from Westlaw.com on February 26, 2025.

19 7. Attached as **Exhibit R** is a true and correct copy of the *Corpus Juris Secundum* article at
20 6A C.J.S. Assignments § 49. I downloaded this article from Westlaw.com on February 26, 2025.

21 8. Attached as **Exhibit S** is a true and correct copy of an article in the California Law
22 Review by William L. Prosser, entitled *Privacy*, 48 Cal. L. Rev. 383, 408 (1960). I downloaded this
23 article from the Berkeley Law Library Catalog at

24 <https://lawcat.berkeley.edu/record/1109651?ln=en&v=pdf>, on February 26, 2025.

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1 I declare under penalty of perjury and the laws of the United States that the statements in this
2 declaration are true and correct to the best of my knowledge, and that this declaration was executed on
3 February 26, 2025, in Palo Alto, California.

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5 *Nathan Walker*

6 Nathan L. Walker
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